

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

CANDICE BAIRD, : Case No. 1:16-CV-759  
: Plaintiff, : Judge Dlott  
vs. : : Magistrate Bowman  
: HAMILTON COUNTY : STIPULATED PROTECTIVE  
DEPARTMENT OF JOB AND : ORDER  
FAMILY SERVICES, et al., :  
: Defendants. :  
:

**PURPOSE**

The purpose of this Stipulated Protective Order is to facilitate the discovery of documents in the custody of Hamilton County Jobs and Family Services (“HCJFS”), which may be relevant to and evidentiary in the above captioned action. Much of the content of these records is confidential as a matter of Ohio law, such as names of juvenile persons subject to legal dependency actions. *See* R.C. 2151.421(H); *see also* R.C. 5153.17; OAC 5101:2-33-21. The redaction of these records would not only be burdensome, but significant such that it potentially would interfere with the comprehensibility of the documents. Consequently, redaction would potentially prejudice the parties in the discovery process of this litigation. Therefore, the parties by and through counsel, agree to stipulate to this Protective Order.

**ORDER**

By agreement of the parties, this Court hereby orders that the discovery of documents in the custody and control of HCJFS and relating to the involvement of HCJFS with Candice Baird, her minor grandchild, Chico Chappell, and Samantha Cruz shall be subject to this Protective Order and held strictly confidential by counsel for each party and may only be

disclosed to counsel for each party, expert witnesses retained by counsel of each party, and Plaintiff, for purposes of prosecuting her case. Furthermore, Plaintiff has a duty not to disclose and/or not to disseminate information contained within these records. The documents protected by this order are marked Defendants' Response to Plaintiff's First Set of Interrogatories and are bates stamped 5-292, 1390-1464, and 1497-1708. Documents or information within those documents subject to this Order shall not be disclosed to the witnesses except where it is necessary for the witness to know the material. None of the documents covered by this Protective Order may be disclosed to any other person, or member of the public. If any document subject to this Protective Order is produced, copied, used in a deposition, or at trial, it shall be marked prominently with the word "CONFIDENTIAL". Any document subject to this order used at trial, in discovery, in a deposition, in an expert report, in a pleading, or in any other way so as to make it a potentially public record, shall be so submitted "under seal" with prior permission of the Court, upon motion and for good cause shown.

This Protective Order does not authorize the filing of protected material under seal. No document may be filed with the Court under seal without prior permission as to each such filing, upon motion and for good cause shown, including the legal basis for filing under seal. See *Proctor & Gamble Co. v. Bankers Trust Co.*, 78 F.3d 219 (6th Cir. 1996). Unless the Court orders otherwise, all sealed documents shall be filed according to S.D. Ohio Civ. R. 5.2.1.

At the conclusion of the litigation, all written materials, including copies made thereof, subject to this Protective Order shall be returned to counsel or the party who produced the materials or destroyed.

IT IS SO ORDERED.

  
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Judge Susan J. Dibit

Agreed to by:

/s/ Marc D. Mezibov

Marc D. Mezibov  
Mezibov Butler  
615 Elsinore Place  
Suite 105  
Cincinnati, OH 45202  
513-621-8800  
Fax: 513-621-8833  
Email: [mmezibov@mezibov.com](mailto:mmezibov@mezibov.com)  
Attorney for Candice Baird

/s/ Kathleen H. Bailey

Kathleen H. Bailey  
Assistant Prosecuting Attorney  
230 East Ninth Street, Suite 4000  
Cincinnati, OH 45202  
513-946-3289  
Fax: 513-946-3018  
Email: [kathy.bailey@hcpros.org](mailto:kathy.bailey@hcpros.org)  
Attorney for HCJFS, Hamilton County, Ohio,  
Dennis Deters, Chris Monzel, Todd Portune,  
Moira Weir, Cheryl Keller, Christopher  
Biersack

/s/ Brian J. Butler

Brian J. Butler  
Mezibov Butler  
615 Elsinore Place  
Suite 105  
Cincinnati, OH 45202  
513-621-8800  
Fax: 513-621-8833  
Email: [bbutler@mezibov.com](mailto:bbutler@mezibov.com)  
Attorney for Candice Baird

/s/ Jerome A. Kunkel

Jerome A. Kunkel  
Assistant Prosecuting Attorney  
230 East Ninth Street, Suite 4000  
Cincinnati, OH 45202  
513-946-3103  
Fax: 513-946-3018  
Email: [jerry.kunkel@hcpros.org](mailto:jerry.kunkel@hcpros.org)  
Attorney for HCJFS, Hamilton County, Ohio,  
Dennis Deters, Chris Monzel, Todd Portune,  
Moira Weir, Cheryl Keller, Christopher  
Biersack

/s/ Jay R. Wampler

Jay R. Wampler  
Assistant Prosecuting Attorney  
230 E. Ninth Street, Suite 4000  
Cincinnati, OH 45202  
513-946-3169  
Fax: 513-946-3018  
Email: [jay.wampler@hcpros.org](mailto:jay.wampler@hcpros.org)  
Attorney for HCJFS, Hamilton County, Ohio,  
Dennis Deters, Chris Monzel, Todd Portune,  
Moira Weir, Cheryl Keller, Christopher  
Biersack

DATED: \_\_\_\_\_